

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-365-E

In the Matter of:)	
)	
Exploration of a South Carolina Competitive)	
Procurement Program for the Competitive)	DUKE ENERGY CAROLINAS,
Procurement of Energy and Capacity from)	LLC’S AND DUKE ENERGY
Solar and Other Renewable Energy Facilities)	PROGRESS, LLC’S PETITION
by an Electrical Utility as Allowed by South)	TO INTERVENE
Carolina Code Section 58-41-20(E)(2) (See)	
Directive Issued on November 25, 2019))	
)	
)	

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” together with DEC, the “Companies”) hereby petition the Public Service Commission of South Carolina (the “Commission”) for permission to intervene in the above-captioned proceeding pursuant to S.C. Code Ann. Reg. 103-825 and other applicable provisions of the Commission’s Rules of Practice and Procedure. In support of this Petition, the Companies show the following and request the following relief:

1. On November 26, 2019, as a result of the Commission Directive issued on November 25, 2019 in Docket 2018-202-E, the Commission opened this Docket in accordance with South Carolina’s Energy Freedom Act under S.C. Code Ann. § 58-41-20(E)(2) for the exploration of a South Carolina competitive procurement program.
2. This Petition to Intervene is timely filed as the Commission has not yet established an intervention deadline or procedural schedule.
3. DEC is a public utility engaged in the generation, transmission, distribution, and sale of electric energy in the western portion of South Carolina and central and western portions

of North Carolina. DEC is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEC is also authorized to transact business in North Carolina and is a public utility under the laws of that state. Accordingly, DEC's operations in North Carolina are subject to the jurisdiction of the North Carolina Utilities Commission. DEC's mailing address is Duke Energy Carolinas, LLC, Post Office Box 1321 (DEC 45A), Charlotte, North Carolina 28201.

4. DEP is a public utility engaged in the generation, transmission, distribution, and sale of electric energy in the eastern portion of South Carolina and western portions of North Carolina. DEP is a public utility under the laws of South Carolina and is subject to the jurisdiction of this Commission with respect to its operations in this State. DEP is also authorized to transact business in North Carolina and is a public utility under the laws of that state. Accordingly, DEP's operations in North Carolina are subject to the jurisdiction of the North Carolina Utilities Commission. DEP's mailing address is Duke Energy Progress, LLC, 410 South Wilmington Street, Raleigh, North Carolina 27601-1849.
5. The attorneys for the Companies, to whom all correspondence and any other matters relevant to this proceeding should be addressed, are:

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6. The Companies have a real and substantial interest in the subject matter of this docket, as the outcome of this proceeding impacts regulated utilities like the Companies. As public utilities, the Companies' interests are directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. Accordingly, the Companies submit that good cause exists for the Commission to allow the Companies to participate as intervenors in this proceeding.
7. The Companies have not developed a final position in this matter, but reserve the right to modify, amend or expand any position the Companies develop during the course of this proceeding, including any position espoused herein.

WHEREFORE, for the reasons set forth above, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC respectfully request that the Commission enter an order (i) granting the Companies the right to intervene in this docket and participate fully in the proceeding and (ii)

granting such other and further relief as the Commission deems to be just and reasonable and in the public interest.

Respectfully submitted this 7th day of January 2020.



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